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*Counsel for Lead Plaintiff Movant
Stanislav Voronov and Proposed Lead
Counsel for the Class*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DONALD RAMSEY, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., BRIAN
ARMSTRONG, ALESIA J. HAAS,
JENNIFER N. JONES, SUROJIT
CHATTERJEE, PAUL GREWAL,
MARC L. ANDREESSEN, FREDERICK
ERNEST EHRSAM III, KATHRYN
HAUN, KELLY KRAMER, GOKUL
RAJARAM, FRED WILSON, AH
CAPITAL MANAGEMENT LLC,
PARADIGM FUND LP, RIBBIT
MANAGEMENT COMPANY, LLC,
TIGER GLOBAL MANAGEMENT,
LLC, UNION SQUARE VENTURES,
LLC, and VISERION INVESTMENT
PTE LTD.

Defendants.

Case No.: 3:21-cv-05634-VC

DECLARATION OF JENNIFER PAFITI,
ESQ. IN SUPPORT OF MOTION OF
STANISLAV VORONOV FOR
CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF, AND APPROVAL OF
LEAD COUNSEL

CLASS ACTION

Date: October 28, 2021

Time: 2:00 p.m.

Judge: Hon. Vince Chhabria

Courtroom: 4 – 17th Floor

GABBY KLEIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

COINBASE GLOBAL, INC., BRIAN
ARMSTRONG, ALESIA J. HAAS,
JENNIFER N. JONES, SUROJIT
CHATTERJEE, PAUL GREWAL, MARC
L. ANDREESSEN, FREDERICK
ERNEST EHRSAM III, KATHRYN
HAUN, KELLY KRAMER, GOKUL
RAJARAM, and FRED WILSON,

Defendants.

Case No.: 4:21-cv-06049-YGR

CLASS ACTION

MATTHEW CATTERLIN, Individually
and on Behalf of All Others Similarly
Situating,

Plaintiff,

vs.

COINBASE GLOBAL, INC., BRIAN
ARMSTRONG, SUROJIT
CHATTERJEE, PAUL GREWAL,
ALESIA HAAS, MARC ANDREESSEN,
FREDERICK ERNEST EHRSAM III,
KATHRYN HAUN, KELLY KRAMER,
GOKUL RAJARAM, FRED WILSON,
AH CAPITAL, LLC, PARADIGM FUND
LP, RIBBIT MANAGEMENT
COMPANY, LLC, TIGER GLOBAL
MANAGEMENT, LLC, UNION
SQUARE VENTURES, LLC, and
VISERION INVESTMENT PTE LTD,

Defendants.

Case No.: 4:21-cv-06149-YGR

CLASS ACTION

1 I, Jennifer Pafiti, Esq., hereby declare as follows:

2 1. I am a Partner with Pomerantz LLP (“Pomerantz”), counsel on behalf of Stanislav
3 Voronov (“Voronov”), and have personal knowledge of the facts set forth herein. I make this
4 Declaration in support of Voronov’s motion for consolidation of the above-captioned related
5 actions (the “Related Actions”), appointment as Lead Plaintiff for the Class, and approval of
6 Voronov’s selection of Pomerantz as Lead Counsel for the Class.
7

8 2. Attached hereto as the exhibits indicated are true and correct copies of the
9 following:

10 Exhibit A: Chart reflecting the financial interest of Voronov in the Related
11 Actions;

12 Exhibit B: Press release published over *Business Wire* on July 22, 2021,
13 announcing the pendency of the first-filed of the above-captioned
14 Related Actions;

15 Exhibit C: Shareholder Certification executed by Voronov;

16 Exhibit D: Declaration executed by Voronov; and

17 Exhibit E: Firm resume of Pomerantz.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing facts are true and correct.

20 Executed on September 20, 2021, at Calabasas, California.

21
22 /s/ Jennifer Pafiti
23 Jennifer Pafiti
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PROOF OF SERVICE

I hereby certify that on September 20, 2021, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jennifer Pafiti

Jennifer Pafiti